

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
WI-LAN INC.,

Plaintiff,

v.

LG ELECTRONICS, INC. and LG
ELECTRONICS U.S.A., INC.,

Defendants.
----- X

10 Civ. 432 (LAK) (AJP)

**AFFIRMATION OF JAMES J.
LUKAS, JR. IN SUPPORT OF
DEFENDANTS' SUPPLEMENTAL
BRIEF IN SUPPORT OF THEIR
MOTION TO PRECLUDE
PLAINTIFF FROM PURSUING A
CLAIM OF PATENT
INFRINGEMENT UNDER THE
DOCTRINE OF EQUIVALENTS
AND MOTION TO STRIKE**

I, James J. Lukas, Jr., affirm as follows:

1. I am an attorney at Greenberg Traurig, LLP, attorneys for Defendants and Counterclaim-Plaintiffs LG Electronics, Inc. and LG Electronics U.S.A., Inc. (collectively "LG" or "Defendants") in the above-captioned matter. I have personal knowledge of the facts discussed herein and, if called to testify, I would and could competently testify to those facts. I respectfully submit this Affirmation in support of Defendants' Supplemental Brief in Support of Their Motion to Preclude Plaintiff from Pursuing a Claim of Patent Infringement Under the Doctrine of Equivalents and Motion to Strike.

2. Attached hereto as **Exhibit A** is a true and correct copy of the Rebuttal of Craig K. Tanner to the Expert Report on Non-Infringement by Adam Goldberg, served February 24, 2011. [FILED UNDER SEAL].

I declare under penalty of perjury under the laws of the United States that the foregoing information is true and correct to the best of my knowledge, information and belief.

Dated: February 27, 2011

/s/ James J. Lukas, Jr.
James J. Lukas, Jr.